



## Waste, Pesticides and Toxics Division

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist  
☐ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action  
☐ Return to Compliance

Facility Name : Bunting Bearings Corporation ,  
Facility Location: 200 Van Buren Street  
Delta, Ohio 43515  
U.S. EPA ID# OHD 042 159 046

Assigned Staff: Michael Beedle

Phone: 3.7922

Name	Signature	Date
Author	Michael Beedle <i>MB</i>	12.15.04
Regional Counsel	James Cha per email on January 5, 2005 <i>see beneath this sheet</i>	1.05.05
Section Chief	<i>[Signature]</i> <i>For Paul Little</i>	<i>1-6-05</i>
Branch Chief		

### Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
  - One copy for the assigned staff;
  - One copy for the section file;
  - One copy for the branch file; and
  - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

1565 3779

James Cha/R5/USEPA/US

To

01/04/2005 04:38 PM

Subject Bunting Bearings

Hi, Mike. See attached. A few minor revisions are in redline. I concur with the report and NOV.



bunting bearings.wpd



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JAN 11 2005

REPLY TO THE ATTENTION OF  
DE-9J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Philip Henzler  
Bunting Bearings Corporation  
200 Van Buren Street  
Delta, Ohio 43515

Re: Notice of Violation  
Compliance Evaluation Inspection  
Bunting Bearings Corporation  
OHD 042 159 046

Dear Mr. Henzler:

On September 14, 2004, a representative of the United States Environmental Protection Agency inspected the Bunting Bearings Corporation facility located in Delta, Ohio. The purpose of the inspection was to evaluate Bunting Bearings Corporation's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by Bunting Bearings Corporation personnel, a review of records, and personal observations by the inspector while inspecting the facility, U.S. EPA finds that Bunting Bearings Corporation is engaged in the management of solid waste and is in violation of certain requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). Specifically, we find that Bunting Bearings Corporation is in noncompliance with the following requirements:

- Violation 1. OAC 3745-52-11 Any person who generates a waste must determine if that waste is a hazardous waste. At the time of the inspection, waste determinations were not available for supersacks of baghouse dust, numerous 55 gallon drums that appeared to be abandoned, graphite cores, and numerous boxes of filters. Bunting Bearings must make waste determinations using knowledge or testing of these wastes.
- Violation 2. OAC 3745-279-22(C)(1) Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used

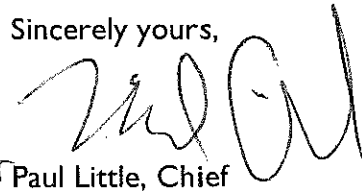
Oil." At the time of the inspection, Bunting Bearings had two drums, storing used oil, not properly labeled or marked "Used Oil".

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, including waste analysis testing results, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Michael Beedle United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Beedle of my staff at 312.353.7922.

Sincerely yours,



For Paul Little, Chief  
Compliance Section # 2  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

Enclosure

cc:

Melissa Boyers, NWDO, Ohio EPA

**U.S. EPA  
Compliance Evaluation  
Inspection Report**

**Bunting Bearings Corporation  
OHD 042 159 046**

**November 30, 2004**

**To:** Paul Little, Chief  
Compliance Section 2  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

**From:** Michael Beedle  
Compliance Section 2

## INSPECTION REPORT

On September 14, 2004, I performed a compliance evaluation inspection at Bunting Bearings Corporation (facility). The purpose of the inspection was to determine Bunting Bearings Corporation's compliance with applicable hazardous waste regulations.

### **1 Facility Information**

Bunting Bearings Corporation  
200 Van Buren Street  
Delta, Ohio 43515  
OHD 042 159 046

Eagle Picher (OHR 000 041 376) is performing a Superfund oversight cleanup of the facility and surrounding community.

### **2 Date of Inspection**

September 14, 2004

### **3 Participants**

Michael Beedle, U.S. EPA

Kim Mendoza, Bunting Bearings Corporation  
Jeff Begorch, Bunting Bearings Corporation

### **4 Start of the Inspection**

I arrived at the facility location. I observed cleanup of the site occurring through the facility fence. I met with Ms. Kim Mendoza. Ms. Mendoza called for Mr. Philip Henzler. Mr. Henzler was in contract negotiations with the union representatives at the time of the arrival. The inspection consisted only of a facility description and tour.

### **5 Facility Description**

The facility manufactures bronze bars. The bars are hollow or solid. The bars are sold to machine shops to manufacture bushing bearings for the automotive industry. The facility operates continuous casting, and centrifugal casting operations.

### **6 Facility Tour**

Mr. Begorch led the facility tour. We started at the Plant 2 Storage. We observed 4 baghouse dust supersacks. The supersacks were not labeled hazardous waste. We observed 2 drums that contained used oil. The drums were not labeled used oil. We observed several drums that appeared to be abandoned. One 55 gallon drum was not labeled. There was one 55 gallon drum that was labeled caustic and one 30 gallon drum that contained hydrochloric acid.

There were numerous waste filters in storage. There were also numerous supersacks (approximately eight) of waste graphite stored.

I observed a shower and fire extinguishers during the tour. The facility has an occupational lead exposure program. The tour of the facility ended at 11:30am.

## **7 Inspection Closeout**

I summarized the used oil labeling requirement, the abandoned drums and waste determination issues.

## **8 Follow-up**

I called Mr. Henzler on November 22 and November 30, 2004, to check on the availability of hazardous waste records. Mr. Henzler returned my call and left a message on December 3, 2004. We finally connected on December 7, 2004.

Mr. Henzler said the facility is a non-hazardous facility. He mentioned the facility has not shipped hazardous waste off site for years. He stated the facility sends off its baghouse dust to be recycled. He said the facility that recycles the dust is recovering zinc and other metals.

Mr. Henzler said the facility does operate parts cleaners. He stated that the facility has a contract with Safety Kleen to deliver new and remove old solvents.

I mentioned the concern of the old drums containing acid, caustic and unknown material. I expressed the concern that material which is no longer being used with no intention of being used could eventually leak. I mentioned such stored material could be considered abandoned. I advised Mr. Henzler that, if the facility does not intend to use the material, it should be disposed of properly. I also discussed the graphite cores, filters and other possible wastes, that were observed in Plant 2 Storage.

Mr. Henzler said he would send me information on who picks up their used oil, the Safety Kleen contract, the waste determination or disposal information regarding the graphite cores and filters. He said he would look into the drums of material I mentioned.

Mr. Henzler sent me an email that describe the following waste streams and destinations:

“Bag House Dust - IWRC (Industrial Waste Recycle Company) in Shannon, IL

Graphite - Industrial Sales in Elk Grove Village, IL

Used oil disposal along with cleaning oil, coolant fluids - Safety Kleen All we have on this is PO.

The other issues are being addressed”

See email in Attachment B.

## **ATTACHMENTS**

- A. EPA Database Printout for Facility
- B. Mr. Henzler's Email

**ATTACHMENT A**  
**EPA Database Printouts for Facility**

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# U.S. Environmental Protection Agency Enforcement & Compliance History Online (ECHO)

[Recent Additions](#) | [Contact Us](#) | [Print Version](#)
[EPA Home](#) > [Compliance and Enforcement](#) > [ECHO](#) > [Search Data](#) > [Detailed Facility Report](#)

## Detailed Facility Report

[Report Error](#)   [Data Dictionary](#)

For Public Release - Unrestricted Dissemination Report Generated on: 09/16/2004  
US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

### Facility Permits and Identifiers

[Data Dictionary](#)

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110000383576	BUNTING BEARINGS CORPORATION	200 VAN BUREN ST.	DELTA	OH	43515
CAA	AFS	3905100018	BUNTING BEARINGS CORP	200-208 VAN BUREN	DELTA	OH	43515
RCRA	RCR	OHD042159046	BUNTING BEARINGS CORPORATION	200 VAN BUREN ST	DELTA	OH	43515
RCRA	RCR	OHR000041376	EAGLE-PICHER INC (BUNTING BEARING SITE)	200 VAN BUREN ST	DELTA	OH	43515
EP313	TRI	43515BNTNG200VA	BUNTING BEARINGS CORP	200 VAN BUREN ST	DELTA	OH	43515

### Facility Characteristics

[Data Dictionary](#)

Statute	Source ID	Facility Status	Permit Expiration Date	Lat/Long	Indian Lands?	SIC Codes	NAICS Codes
	110000383576			LRT lat: 41.5750 LRT long: -83.9976	NA		
CAA	3905100018	Operating, Synthetic Minor (Fed. Rep.)			NA	3362	
RCRA	OHD042159046	LQG			No		
RCRA	OHR000041376	SQG			No		
EP313	43515BNTNG200VA			lat: 41.5755 long: -83.9969	NA	3399	

If the CWA permit is past its expiration date, this normally means that the permitting authority has not yet issued a new permit. In these situations, the expired permit is normally administratively extended and kept in effect until the new permit is issued.

### Inspection and Enforcement Summary Data

[Data Dictionary](#)

Statute	Source ID	RECAP Insp. Last 02 Yrs	Date of Last Inspection	Formal Enf Act Last 02 Yrs	Penalties Last 02 Yrs
CAA	3905100018	0	04/11/1996	0	\$00
RCRA	OHD042159046	0	04/29/2002	0	\$00
RCRA	OHR000041376	0	Never	0	\$00

### Inspection History (02 years )

[Data Dictionary](#)

Statute	Source ID	Inspection Type	Lead Agency	Date
- No data records returned.				

Entries in *italics* are not considered inspections in Reporting for Enforcement and Compliance Assurance Priorities (RECAP) official counts.

### Compliance Summary Data

[Data Dictionary](#)

Statute	Source ID	Current SNC/HPV?	Current As Of	Description	Qtrs in NC (of 8)
CAA	3905100018	NO	08/14/2004		8
RCRA	OHD042159046	NO	08/09/2004		0
RCRA	OHR000041376	NO	08/09/2004		0

## Two Year Compliance Status by Quarter

[Data Dictionary](#)

Violations shown in a given quarter do not necessarily span the entire 3 months.

AIR Compliance Status								
Statute:Source ID CAA: 3905100018	QTR1 Oct-Dec02	QTR2 Jan-Mar03	QTR3 Apr-Jun03	QTR4 Jul-Sep03	QTR5 Oct-Dec03	QTR6 Jan-Mar04	QTR7 Apr-Jun04	QTR8 Jul-Sep04
HPV History								
Program/Pollutant in Current Violation								
SIP	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH
FUGITIVE DUST								V-NO SCH

High Priority Violator (HPV) History section: "Unaddr" means the facility has not yet been addressed with a formal enforcement action. "Addr" means the facility has been addressed with a formal enforcement action, but its violations have not been resolved. Lead Agency designated can be US EPA, State, Both, or No Lead Determined. If HPV History is blank, then the facility was not a High Priority Violator. C=Compliance; V=Violation; S=Compliance Schedule.

## Formal Enforcement Actions - AFS, PCS, RCRAInfo, NCDB (02 year history)

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

In some cases, formal enforcement actions may be entered both at the initiation and final stages of the action. These may appear more than once above. Entries in *italics* are not "formal" actions under the PCS definitions but are either the initiation of an action or penalties assessed as a result of a previous action. This section includes US EPA and State formal enforcement actions under CAA, CWA and RCRA.

## EPA Formal Enforcement Actions - ICIS (02 year history)

[Data Dictionary](#)

Primary Law/Section	Case Number	Case Type	Case Name	Issued/Filed Date	Settlement Date	Penalty	SEP Cost
- No data records returned.							

Federal enforcement actions and penalties shown in this section are from the Integrated Compliance Information System (ICIS). These actions may duplicate records in the Formal Enforcement Actions section.

## Demographic Profile of Surrounding Area (3 Miles)

[Data Dictionary](#)

Open more detailed information in a new window (links leave ECHO): [1 Mi](#) [3 Mi](#) or [5 Mi](#).

This section is to provide context regarding the community setting of the facility. No relationship between this information, and other data included in this report is implied. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table(LRT) when available.

Radius of Area:	3 Miles	Land Area:	99.89%	Households in area:	1,911
Center Latitude:	41.5750	Water Area:	0.11%	Housing units in area:	2,000
Center Longitude:	-83.9976	Population Density:	181.76/sq. mi.	Households On Public Assistance:	53
Total Persons:	5,133	Percent Minority:	6.04%	Persons Below Poverty Level:	376

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	4,933 (96.10%)	Child 5 years and less:	462 ( 9.00%)
African-american:	4 ( 0.06%)	Minors 17 years and younger:	1,479 (28.81%)
Hispanic-Origin:	236 ( 4.60%)	Adults 18 years and older:	3,654 (71.19%)
Asian/Pacific Islander:	10 ( 0.19%)	Seniors 65 years and older:	619 (12.06%)
American Indian:	28 ( 0.55%)		
Other/Multiracial:	125 ( 2.44%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	104 ( 3.46%)	Less than \$15,000:	195 (10.20%)
9th-12th grades:	402 (13.39%)	\$15,000-\$25,000:	201 (10.52%)
High School Diploma:	1,421 (47.34%)	\$25,000-\$50,000:	666 (34.85%)
Some College/2-yr:	703 (23.42%)	\$50,000-\$75,000:	472 (24.70%)

**ATTACHMENT B**

**Mr. Henzler's Email**





phenzler  
<phenzler@buntingbearings .c  
om>

To  
Subject Delta

12/08/2004 09:03 AM

Michael,

As a follow up to our telephone conversation from yesterday, listed below you will find the answers to your questions.

Bag House Dust - IWRC (Industrial Waste Recycle Company) in Shannon, IL

Graphite - Industrial Sales in Elk Grove Village, IL

Used oil disposal along with cleaning oil, coolant fluids - Safety Kleen All we have on this is PO.

The other issues are being addressed.

Phillip W. Henzler, Sr., SPHR  
Corporate Director, Human Resources  
Bunting Bearings Corp.  
(419)866-7720



UNITED STATES POSTAL SERVICE

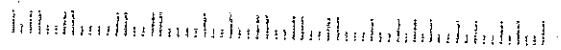


First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA  
77 W. Jackson Blvd  
Chicago, Illinois 60604  
ATTN: Michael Beedle DE-9J

604+3604



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Philip Henzler  
Bunting Bearings Corporation  
200 Van Buren Street  
Delta, OH 43515

2. Article Number  
(Transfer from service label)

7001 0320 0006 1565 5779

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

Kim Mendoza 1-13-05

C. Signature

X Kim Mendoza ☐ Agent☐ AddresseeD. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.4. Restricted Delivery? (Extra Fee) ☐ Yes